ALTA GEOSCIENCES, Inc.

Environmental & Geotechnical Solutions

October 15, 2002

U.S. Environmental Protection Agency
1200 6th Ave OW-133
Seattle, Wa. 98101

Attention: Mr. Christopher Cora

Subject: Notification Of Remedial Action Completion and
Final Completion of Remedial Action Report
Standard Steel & Metals Salvage Yard Superfund Site
Anchorage, Alaska

This letter provides notification to EPA of the final completion of the Remedial Action for the Standard Steel & Metals Salvage Yard Superfund Site (hereafter "Site"). This document was prepared by ALTA Geosciences, Inc. (ALTA) of Bothell, Washington, on behalf of the Standard Steel RD/RA PRP Group, consisting of (listed alphabetically): Chugach Electric Association, Inc.; J.C. Penny Company, Inc.; Montgomery Ward and Co.; and Sears, Roebuck and Co., Inc., and Viacom Corp. (formerly Westinghouse Electric Corporation and CBS Corp.). Pursuant to the Consent Decree (dated 1/26/98) signed by the members of the PRP Group, they are considered the settling defendants.

This Notification of Completion and Final Completion of Remedial Action Report is required by the Consent Decree, Section XIV, paragraph 50, as part of the Remedial Design and Remedial Action Construction for the Standard Steel and Metals Salvage Yard Superfund Site (Site).

A Certification as required under the Consent Decree is attached.

Supporting Documentation

To support this notification and report, the following brief summaries are presented in this letter:

- Site Regulatory Background and Summary of Remedial Action
- Summary of RA Construction Completion Report
- Summary of Groundwater Monitoring Program
- Summary of Operations & Maintenance
- Summary of Final Inspection

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The following documents are attached as supporting documentation:

- EPA Approval of Remedial Action Construction Completion Report (December 6, 1999)
- Final Site Plan from the RA Construction Completion Report

SUMMARY OF REMEDIAL ACTION ACTIVITIES

The Standard Steel and Metals Salvage Yard Superfund Site is approximately 6.2 acres in size and is located in the northern part of Anchorage, Alaska. For a number of years, the Site was operated as a scrapyard and materials recycling business. During these operations, lead batteries and power transformers containing PCBs were recycled on the Site, leading to contamination from both lead and PCBs.

Investigations at the Site lead to it being listed on the National Priorities List on January 14, 1989. After expedited removal operations, and completion of a Remedial Investigation, and Feasibility Study in 1996, the EPA Record of Decision (ROD) was issued on July 16, 1996. In 1997, a group of companies named by EPA as Potentially Responsible Parties formed the Standard Steel RD/RA PRP Group, and through a Consent Decree with EPA, dated January 26, 1998, undertook the Remedial Design (RD) effort, which was completed by late January 1998. Under the Consent Decree, the PRP Group agreed to conduct the Remedial Design and Remedial Action, and pursuant to the Consent Decree, the PRP Group is considered the "settling Defendants" in the case.

Remedial Action (RA) Construction was undertaken by the PRP Group, starting in April 1998 and was substantially completed by November 1998. Landscaping work and streambank restoration work on Ship Creek was finished in June 1999. ALTA Geosciences, Inc., of Bothell, Washington, acted as the Project Engineer during the Remedial Design and provided construction oversight during the Remedial Action Construction. General Contractor for the Remedial Action Construction was Wilder Construction Company of Anchorage, Alaska. Elements of the construction included:

- Construction of an onsite TSCA compliant landfill (generally referred to as the "consolidation cell" in this report and throughout the design) for isolation of impacted soils, including a geomembrane cover system and up to 3 feet of soil

- Excavation of 32,700 tons of moderately impacted soils and placement without treatment into the consolidation cell (TSCA compliant landfill)

- Excavation, stabilization/solidification treatment and consolidation of 22,272 tons of more heavily impacted soils, including lead stabilization with Maectite of 9,700 tons of soil

- Screening, classification, and disposal of ordnance related scrap and potential UXO materials

- Construction of an erosion control wall to protect the consolidation cell from floodwaters, involving 13,700 tons of riprap and bedding materials

- Site Restoration and landscaping to return the area to productive use and stable environmental conditions

The RA Construction excavations and treatment operations were driven by removal action criteria set forth in the ROD and incorporated into the Remedial Design. In addition to using information generated during the design and prior phases of work, a total of 1496 lead and/or PCB tests were performed during the RA Construction to define appropriate soil removal areas and depths, determine the necessity for treatment, and for confirmation purposes following removal. Statistical analysis of confirmation laboratory data demonstrate that the Site is in compliance with performance standards set forth in the Statement of Work.

SUMMARY OF RA CONSTRUCTION COMPLETION REPORT

The Remedial Action Construction for the Site was primarily undertaken in 1998, with minor streambank restoration being completed in 1999. Near-surface Lead and PCB contaminated soil was excavated from areas throughout the Site and placed in a capped consolidation cell. More highly impacted soils were treated by solidification/stabilization prior to consolidation. A zone of PCB contamination containing free transformer oil product was excavated, treated, and consolidated with other highly impacted soils.

The RA Construction Completion Report documents in detail the work completed. Surveys of soil removal areas and depths were presented. A comprehensive confirmation sampling and analysis program was documented. Special onsite treatment for Lead, and soil treatment by stabilization/solidification was described thoroughly. Air monitoring and other construction records were presented or summarized. Details of the consolidation cell, which contains removed impacted materials, were set forth in detailed drawings and text descriptions. Hydraulic isolation and surface erosion protection features of the consolidation cell were documented. Site restoration features were described and mapped in detail. This report contains the final Construction Record Drawings for the Remedial Action

which are signed and stamped by a registered professional engineer. EPA accepted this report as complete in 1999.

SUMMARY OF GROUNDWATER MONITORING PROGRAM

A Final Groundwater Monitoring Plan was developed for the Site and issued by ALTA Geosciences in November 1998. The purpose of this document was to describe the activities associated with groundwater sampling and analysis to be performed at the Site, as required by the Record of Decision (ROD) for the Site. Supporting documents to this Work Plan include the Field Sampling Plan (Appendix A), the Quality Assurance Project Plan (Appendix B), and the Health and Safety Plan (Appendix C).

The approved Work Plan called for sampling and analysis of wells MW13, MW14, MW15, MW22, and MW24. The plan called for monitoring semi-annually for three years, then (with EPA approval) annual monitoring. For each monitoring event, five wells were sampled for PCBs, Lead, and volatile organic compounds. The QA plan called for relatively low reporting limits during analysis. Sampling included collection of a duplicate sample, matrix spike and matrix spike duplicates samples and QA analysis of data. A Level 3 data package was required from the analytical laboratory. These monitoring activities were carried out on schedule.

Water quality results are summarized in the following data summary table. The groundwater monitoring data shows that the Groundwater Performance Standards set forth in the Statement of Work have been met.

Table 3-4
POST-CONSTRUCTION WATER QUALITY SUMMARY 1998 -- 2002

Well No.	MW-13	MW-13	MW-13	MW-13	MW-13	MW-13	MW-13	MW-14	MW-14	MW-14	MW-14	MW-14	MW-14	MW-14
Date	Apr-98	Nov-99	May-99	Apr-00	Oct-00	Aug-01	Aug-02	Apr-98	Nov-99	May-99	Apr-00	Oct-00	Aug-01	Aug-02
Constituents														
Polychlorinated Biphenyls (ug/l)														
PCB-1016	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1221	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1232	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1242	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1248	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1254	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1260	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Chlorinated Hydrocarbons (ug/l)														
1,2,4-Trichlorobenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.53F
1,2,3-Trichlorobenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.28
Tetrchloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Trichlorofluoroethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon Disulfide	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
4-isopropyltoluene	ND	ND	ND	1.26	ND	ND	ND	ND	1.55	ND	ND	ND	ND	ND
Chloromethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.19	ND	ND
Petroleum Hydrocarbons (ug/l)														
Naphthalene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.19	ND	ND
Inorganics (ug/L)														
Lead	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.9F	ND	ND

NOTE: Values with a 'F' flag are estimated, below the reporting limit

Table 3-4
POST-CONSTRUCTION WATER QUALITY SUMMARY 1998 -- 2002

Well No.	MW-15	MW-15	MW-15	MW-15	MW-15	MW-15	MW-15	MW-22	MW-22	MW-22	MW-22	MW-22	MW-22	MW-22
Date	Apr-98	Nov-99	May-99	Apr-00	Oct-00	Aug-01	Aug-02	Apr-98	Nov-99	May-99	Apr-00	Oct-00	Aug-01	Aug-02
Constituents														
Polychlorinated Biphenyls (ug/l)														
PCB-1016	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1221	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1232	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1242	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1248	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1254	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1260	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Chlorinated Hydrocarbons (ug/l)														
1,2,4-Trichlorobenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,2,3-Trichlorobenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Tetrchloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Trichlorofluoroethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon Disulfide	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
4-isopropyltoluene	ND	1.48	ND	ND	ND	ND	ND	ND	0.97	ND	ND	ND	ND	ND
Chloromethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Petroleum Hydrocarbons (ug/l)														
Naphthalene	ND	ND	ND	ND	ND	ND	1.29F	ND	ND	ND	ND	ND	ND	ND
Inorganics (ug/L)														
Lead	ND	ND	ND	ND	ND	ND	2.64	ND	ND	ND	ND	1.1	1.19F	ND

NOTE: Values with a 'F' flag are estimated, below the reporting limit

Table 3-4
POST-CONSTRUCTION WATER QUALITY SUMMARY 1998 -- 2002

Well No.	MW-24	MW-24	MW-24	MW-24	MW-24	MW-24	MW-24
Date	Apr-98	Nov-99	May-99	Apr-00	Oct-00	Aug-01	Aug-02
Constituents							
Polychlorinated Biphenyls (ug/l)							
PCB-1016	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1221	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1232	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1242	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1248	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1254	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
PCB-1260	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Chlorinated Hydrocarbons (ug/l)							
1,2,4-Trichlorobenzene	ND	ND	ND	ND	ND	ND	0.31F
1,2,3-Trichlorobenzene	ND	ND	ND	ND	ND	ND	ND
Tetrchloroethene	ND	ND	ND	ND	ND	0.37F	0.45F
Trichlorofluoroethane	ND	ND	ND	ND	ND	ND	ND
Carbon Disulfide	ND	3.44	ND	ND	ND	ND	ND
4-isopropyltoluene	ND	ND	ND	ND	ND	ND	ND
Chloromethane	ND	ND	ND	ND	ND	ND	ND
Petroleum Hydrocarbons (ug/l)							
Naphthalene	ND	ND	ND	ND	ND	ND	ND
Inorganics (ug/L)							
Lead	ND	ND	ND	ND	0.9	ND	2.28

NOTE: Values with a 'F' flag are estimated, below the reporting limit

PCB results have uniformly been non-detect, with the laboratory reporting limit at 0.10 ug/L. Lead, hydrocarbon, and chlorinated hydrocarbon results have periodically shown very low level detections (near or below the reporting limits). In August 2002, Tetrachloroethene and Trichlorobenzene were identified in two down-gradient wells, MW-24 and MW-14. These levels are comparable to occasional detections of these and related compounds in these and other site wells that have occurred sporadically in the past. In all cases, the reported detections are far below applicable cleanup levels, and no detections have occurred that would suggest the remedy is not adequately protective of Site groundwater.

SUMMARY OF OPERATIONS & MAINTENANCE

The *Operations and Maintenance Plan* ALTA Geosciences, November 1998), was part of the Remedial Action Design, and presented a discussion of the features constructed during the Remedial Action and the maintenance, inspection, and monitoring requirements which apply to the Site in the post-RA Construction era. The following items were addressed by this Plan:

- Purpose of O&M requirements
- Operating limitations for the Site
- Maintenance requirements for the TSCA Landfill and adjacent structures
- Schedule of O&M events
- Health and safety considerations
- Responsibility
- Contingency measures
- Groundwater sampling and analysis
- Inspection procedures
- Reporting requirements

Since completion of the RA Construction, semi-annual inspections have been completed, as required by the O&M Plan and reports submitted to EPA. Only one minor problem has been identified to date. This relates to surface water erosion around a ditch in the northeast corner of the Site. Because of high water runoff, some soil erosion was noted after the Winter of 2000-2001. A contractor was hired to fill in eroded areas, clean sediment out the ditch, and apply rock to areas subject to future erosion. These measures were documented in a May 31, 2001 letter from ALTA Geosciences to EPA, titled *Erosion Control Measures*. There are no other known O&M problems at the Site.

SUMMARY OF FINAL INSPECTION

A Final Inspection of the Remedial Action Construction was held with U.S. EPA on June 25, 1999. No significant deficiencies were observed. A copy of the letter from EPA documenting that inspection is included as an attachment.

CONCLUSION

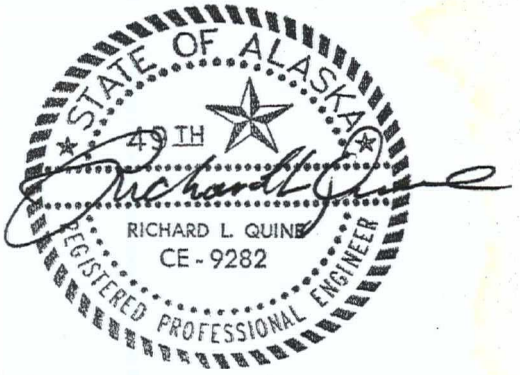
The Remedial Action Construction for the Site was completed in 1999. Near-surface Lead and PCB contaminated soil was excavated from areas throughout the Site and placed in a capped consolidation cell. More highly impacted soils were treated by solidification/stabilization prior to consolidation. A zone of PCB contamination containing free transformer oil product was excavated, treated, and consolidated with other highly impacted soils. After soil was placed in this cell, the potential for leaching of Lead and PCBs to groundwater was greatly reduced through stabilization and hydraulic isolation. This has had a favorable long-term impact on groundwater resources within and surrounding the Site, as documented in the Groundwater Monitoring Reports. Considered together, the RA Construction Report, Groundwater Monitoring Reprts, and the O&M Inspections demonstrate the Remedial Action is operational and functional and the performance standards set forth in the Statement of Work have been met.

If you have any questions, or comments, please call at your earliest convenience.

Sincerely,
***ALTA* Geosciences Inc.**

Alex Tula, R.G.
Project Coordinator

Richard L. Quine, P.E.
Project Engineer



Attachments: Certification Letter
Final Site Plan
Final Inspection Letter

Remedial Action Completion Notice
Standard Steel and Metals Salvage Yard Superfund Site
Anchorage, Alaska
October 11, 2002

To the best of my knowledge, after thorough investigation, I certify that the information contained in or accompanying this submittal is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibilities of fine and imprisonment for knowing violations.

David R. Duvall
Authorized Representative
Standard Steel RD/RA PRP Group

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

December 6, 1999

Reply To
Attn Of: ECL-111

Alex Tula
Alta Geosciences, Inc.
11711 Northcreek Parkway S.
Suite 101
Bothell, Washington 98011-8224

Re: EPA Approval of Remedial Action Construction Completion Report, Standard Steel and Metals Salvage Yard, September 13, 1999

Dear Mr. Tula:

The U.S. Environmental Protection Agency (EPA) has reviewed and approves the Final Remedial Action Construction Completion Report. The Standard Steel and Metals Salvage Yard site is now in an "operation and maintenance" mode, including monitoring. Upon determination by Settling Defendants that the remedial action is operational and functional and that Performance Standards identified in the July 1996 Record of Decision have been met, but not less than two years following the Final Construction Completion Inspection Settling Defendants should notify EPA and the State that the Remedial Action is complete. The Final Inspection was conducted on June 25, 1999.

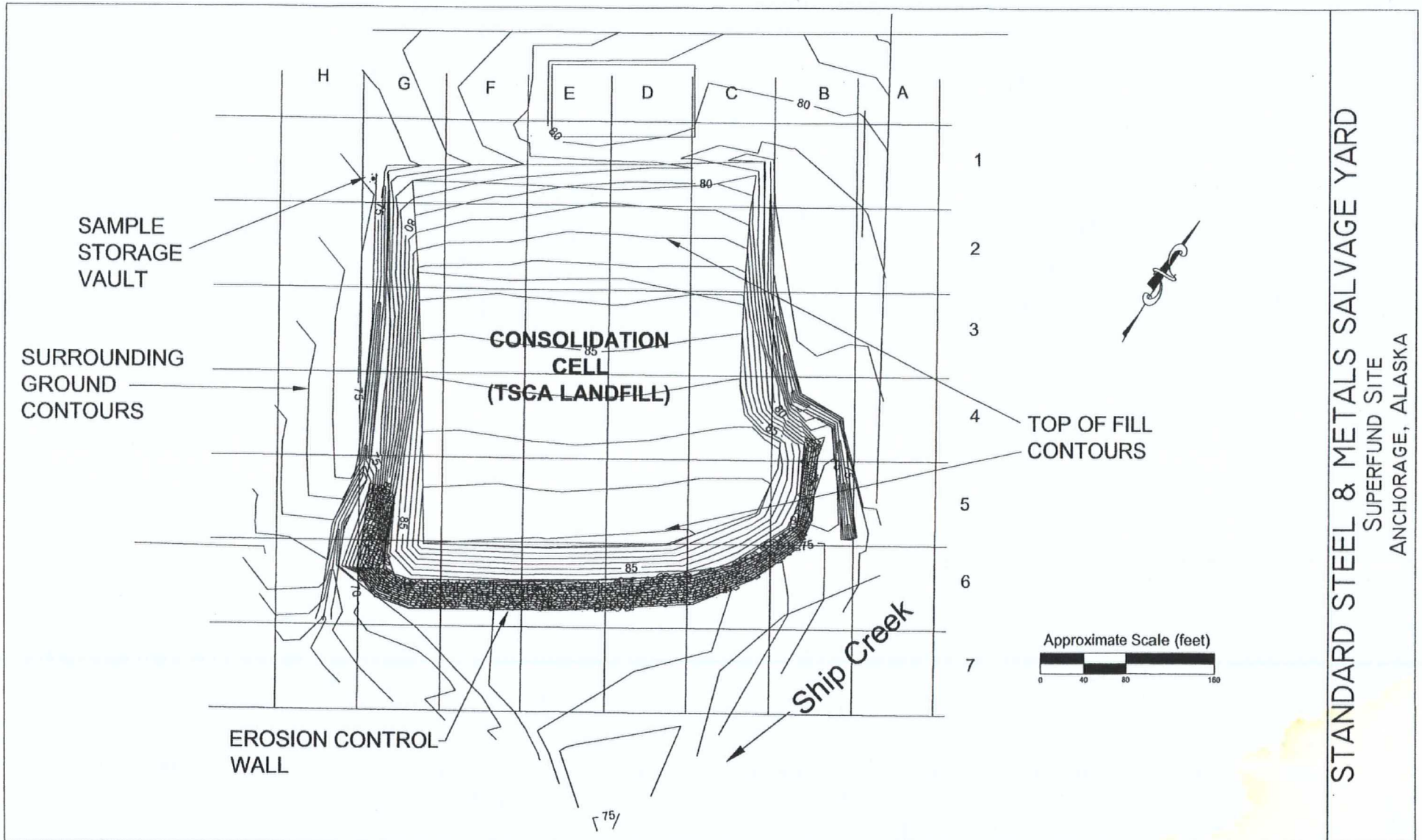
In regards to your October 7, 1999 letter requesting that EPA eliminate the requirement to submit monthly progress reports for the Site. EPA has reviewed the relevant sections of the Consent Decree (Sections X, XII, XXXI). The requirement to submit monthly status reports is contained in the body of the Consent Decree. In order to "materially modify" the Consent Decree we would have to obtain the approval of all parties, and the Court. Due to the level of effort required to revise a Consent Decree EPA believes it is unjustified for the reasons presented in your letter. If the Settling Defendants provide additional significant reason to undertake this course of action, EPA will consider it.

If you have any questions please contact me at (206) 553-1148

Sincerely,

Christopher Cora
Project Manager

cc: Lewis Howard, ADEC
Bruce Noble, DRMS



STANDARD STEEL & METALS SALVAGE YARD
SUPERFUND SITE
ANCHORAGE, ALASKA

ALTA GEOSCIENCES, INC. BOTHELL, WASHINGTON	REMEDIAL ACTION COMPLETION NOTICE SEPTEMBER 2002	FINAL CONTOURS CONSOLIDATION CELL	FIGURE 1